

1 **SEAN FORBUSH ESQ.**

NV Bar # 12741

2 **ROBERT T. HERNANDEZ, ESQ.**

NV Bar # 13892

3 **CARMAN COONEY FORBUSH PLLC**

4045 Spencer Street Suite A47

Las Vegas, NV 89119

5 Telephone: (702) 421-0111

Facsimile: (702) 516-1033

6 [service@ccfattorneys.com](mailto:service@ccfattorneys.com)

Attorneys for Defendant

7 Mercury Casualty Company

8  
9  
10 **UNITED STATES DISTRICT COURT**  
11 **DISTRICT OF NEVADA**

12 LUIS J. ROJAS,

13 Plaintiff,

14 v.

15 MERCURY CASUALTY COMPANY, a  
16 Foreign Corporation; DOES I through X; and  
17 ROE CORPORATIONS I through X,  
inclusive,

18 Defendants

2:21-CV-00471-JAD-DJA

**STIPULATION AND ORDER  
TO EXTEND SCHEDULING  
ORDER DEADLINES BY  
SIXTY DAYS \*THIRD  
REQUEST\***

20 Pursuant to Local Rule IA 6-1 and II 26-4, Defendant Mercury Casualty  
21 Company and Plaintiff Luis J. Rojas, by and through their respective counsel of  
22 record, stipulate to a sixty day extension of the following designated deadlines.  
23



CARMAN COONEY FORBUSH  
PLLC

1 This is the third such request for an extension and it is entered in good faith  
2 without any intent to delay.

### 3 **I. Introduction**

4 The parties have performed all necessary discovery in this matter . Further,  
5 the Parties have disclosed Initial Experts and rebuttal experts. The parties have  
6 agreed to continue the dates by sixty days to accommodate a supplemental  
7 Settlement Conference in an attempt to resolve this matter prior to incurring fees  
8 and costs related to Motions in Limine and trial.

### 9 **II. Discovery Status**

#### 10 **a. Discovery that has been Completed:**

- 11 1. Plaintiff's initial disclosures
- 12 2. Defendant's initial disclosures
- 13 3. Plaintiff's first set of interrogatories
- 14 4. Mercury's responses to the first set of interrogatories
- 15 5. Plaintiff's first set of requests for production of documents
- 16 6. Mercury's responses to the first set of requests for  
17 production of documents
- 18 7. Plaintiff's first supplemental set of disclosures
- 19 8. Plaintiff's Second supplemental set of disclosures
- 20 9. Plaintiff's Third supplemental set of disclosures
- 21 10. Deposition of Plaintiff
- 22 11. Designation of Initial Expert Witnesses
- 23



12. Plaintiff's First Designation of Rebuttal Witnesses

**b. Discovery that Remains**

1. NA

**III. Reason for the Requested Extension**

On 01/31/2024, the Parties filed a Joint Request for Settlement Conference (Document 23), therein, requesting a settlement conference to occur sometime between 02/13/2024 and 03/06/2024. The Parties seek to continue trial by 60 days to allow for the potential of resolution before additional costs and fees have been incurred for Motions in Limine and trial preparation.

Trial in this matter has been set for April 9, 2024. Motions in Limine are presently due on February 9, 2024. The Parties seek an extension to accommodate an additional settlement conference.

**IV. Proposed Schedule**

Trial in this matter has been set for April 9, 2024. Motions in Limine are presently due on February 9, 2024. The Parties seek an extension of at least 60 days to accommodate an additional settlement conference.

///

///

///

///

///

///



1 All parties agree that the requested sixty-day extension of all designated  
2 deadlines is necessary to provide time for possible resolution.

3 DATED February 1, 2024

DATED February 1, 2024

4 **CARMAN COONEY FORBUSH**  
5 **PLLC**

**GEORGE T. BOCHANIS, LTD.**

6 /s/Benjamin J. Carman

/s/Eunice M. Beattie

7 BENJAMIN J. CARMAN, ESQ.  
8 ROBERT T. HERNANDEZ, ESQ.  
9 Attorneys for Defendant  
10 Mercury Casualty Company

GEORGE T. BOCHANIS, ESQ.  
EUNICE M. BEATTIE, ESQ.  
Attorneys for Plaintiff  
Luis J. Rojas

11 **ORDER**

12 Based on the parties' stipulation [ECF No. 24] and good cause appearing, IT IS  
13 HEREBY ORDERED that THE JURY TRIAL SET FOR 4/9/24 [ECF No. 19] and all related  
14 deadlines are VACATED.

15 IT IS FURTHER ORDERED that the **JURY TRIAL of this matter is reset to the**  
16 **June 18, 2024, 9 a.m. trial stack, and the CALENDAR CALL is reset to June 3, 2024, at**  
17 **1:30 p.m. All trial documents are due no later than 10 a.m. on June 3, 2024, and motions**  
18 **in limine are due by May 4, 2024,** with responses due 14 days later. Otherwise, all  
19 instructions in the pretrial order continue to apply.  
20  
21  
22  
23

24   
UNITED STATES DISTRICT JUDGE

February 8, 2024



CARMAN COONEY FORBUSH  
PLLC

**CERTIFICATE VIA CM/ECF**

Pursuant to FRCP 5, I hereby certify that I am an employee of CARMAN COONEY FORBUSH, PLLC, and that on February 1, 2024, I caused to be served via CM/ECF a true and correct copy of the document described herein.

**Document Served:**

**STIPULATION TO EXTEND SCHEDULING ORDER DEADLINES BY SIXTY DAYS \*THIRD REQUEST\***

**Person(s) Served:**

George T. Bochanis  
Eunice M. Beattie  
**George T. Bochanis, LTD.**  
631 South Ninth Street  
Las Vegas, NV 89101  
Attorney for Plaintiff,  
Luis J. Rojas

/s/ Pierra Graham-Blanchard

---

**CARMAN COONEY FORBUSH PLLC**



CARMAN COONEY FORBUSH  
PLLC